

Reilley D. Keating, OSB No. 073762
reilley.keating@stoel.com
Stephen H. Galloway, OSB No. 093602
stephen.galloway@stoel.com
STOEL RIVES LLP
760 SW Ninth Avenue, Suite 3000
Portland, OR 97205
Telephone: (503) 224-3380
Facsimile: (503) 220-2480

Attorneys for Defendants

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION

THE UNITED STATES OF AMERICA, ex
rel. MICHAEL T. BROOKS,

Relator,

v.

TRILLIUM COMMUNITY HEALTH
PLAN, INC., AGATE RESOURCES, INC.,
and LANE INDIVIDUAL PRACTICE
ASSOCIATION, INC.,

Defendants.

Case No.: 6:14-cv-01424-MC

**DECLARATION OF REILLEY D.
KEATING IN SUPPORT OF
DEFENDANTS' MOTION FOR
ORDER TO SHOW CAUSE WHY
RELATOR SHOULD NOT BE
ADJUDGED IN CIVIL CONTEMPT**

I, Reilley D. Keating, declare as follows:

1. I am one of the counsel of record for Trillium Community Health Plan, Inc., Agate Resources, Inc., and Lane Individual Practice Association, Inc., in the above-captioned proceeding. I make this declaration in support of Defendants' Motion for Order to Show Cause

Page 1 - DECLARATION OF REILLEY D. KEATING IN SUPPORT OF
DEFENDANTS' MOTION FOR ORDER TO SHOW CAUSE WHY RELATOR
SHOULD NOT BE ADJUDGED IN CONTEMPT

Why Relator Should Not Be Adjudged in Civil Contempt. I have personal knowledge of the facts stated in this declaration.

2. Attached hereto as Exhibit 1 is a true and correct copy, with pertinent portions highlighted, of email correspondence between myself and Relator Michael T. Brooks on August 6, 2021.

3. Attached hereto as Exhibit 2 is a true and correct copy, with pertinent portions highlighted, of an email that Mr. Brooks sent me on August 9, 2021.

I hereby declare under penalty of perjury that the foregoing is true and correct.

DATED: August 10, 2021.

/s/ Reilley D. Keating
Reilley D. Keating

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing **DECLARATION OF REILLEY D. KEATING IN SUPPORT OF DEFENDANTS' MOTION FOR ORDER TO SHOW CAUSE WHY RELATOR SHOULD NOT BE ADJUDGED IN CONTEMPT** on the following named person(s) on the date indicated below by:

- mailing with postage prepaid
- overnight delivery
- email
- notice of electronic filing using the CM/ECF system

to said person(s) a true copy thereof, contained in a sealed envelope, addressed to said person(s) at his or her last-known address(es) indicated below.

Michael T. Brooks
32713 Vintage Way
Coburg, OR 97408
Tel: 541-556-6130
Email: mibrooks@mac.com

Plaintiff Pro Se

DATED: August 10, 2021.

STOEL RIVES LLP

/s/ Reilley D. Keating
REILLEY D. KEATING, OSB No. 073762
reilley.keating@stoel.com
STEPHEN H. GALLOWAY, OSB No. 093602
stephen.galloway@stoel.com
Telephone: 503.224.3380

Of Attorneys for Defendants